



FEDERAL ELECTION COMMISSION
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May 22, 2006

MEMORANDUM

27044171898

TO: The Commission

FROM: Lawrence H. Norton
General Counsel

By: Rhonda J. Vosdinger
Associate General Counsel for Enforcement

SUBJECT: MURs 5403, 5466 527 MURs - ACT, JVC, Leadership
Forum, Environment '04, LCV, MoveOn.org, DNC

I. Introduction

In the fall of 2004, we received a number of complaints alleging that a number of 527 organizations had violated the FECA, with some organizations named in multiple complaints. Shortly thereafter, we circulated to the Commission a single First General Counsel's Report addressing all of these complaints and respondents, and the Commission found reason to believe on one or more legal theories, including political committee status, coordination, and/or allocation. Since that time, we have processed these MURs generally under either a single MUR number or multiple MUR numbers that, due to the overlapping respondents, result in administrative records that can be somewhat confusing. In the interest of more streamlined record-keeping, we recommend some changes that would consolidate groups of respondents under separate MUR numbers. These changes would entail severing certain respondents from some MURs and opening new MURs that would involve only a particular group of respondents, as detailed below.

II. MUR 5403

The respondents in MUR 5403 include America Coming Together (ACT), the Leadership Forum, and Joint Victory Campaign (JVC), and their treasurers. At this time, we recommend that the Leadership Forum be severed from MUR 5403 and moved to a separate new MUR

ACT and Carl Pope, as treasurer, the primary respondents, would remain in MUR 5403. Because some of the allegations concerning ACT involve ACT's interactions with JVC, JVC and Janice Anne Enright, as treasurer, would also remain in MUR 5403.¹

III.

With respect to MUR we recommend that ACT and Carl Pope, as treasurer, be severed and moved into MUR 5403/5466.²

In addition, we recommend that the following respondents be severed and moved into new separate MURs: Environment 2004 (527) and Environment 2004 PAC and Aimee Christensen, as Treasurer; League of Conservation Voters 527; League of Conservation Voters Action Fund and Barbara Gonzalez-McIntosh, as Treasurer; MoveOn PAC and Wesley Boyd, as Treasurer, and MoveOn.org Voter Fund

¹ Because ACT is the only respondent in MUR 5466, there is no need to sever ACT from MUR 5466 to ensure clear records. Thus, General Counsel's Reports, memoranda, and other documents addressing ACT will be labeled with both MUR numbers, 5403 and 5466.

² See footnote 1.

RECOMMENDATIONS

In MUR 5403:

1. Sever the Leadership Forum and open a new MUR;

- 2.

In MUR

3. Sever ACT and Charles Pope, as Treasurer, and move these respondents to MUR 5403;

4. Sever Environment 2004 (527) and Environment 2004 PAC and Aimee Christensen, as Treasurer, and open a new MUR;

5. Sever League of Conservation Voters 527; League of Conservation Voters Action Fund and Barbara Gonzalez-McIntosh, as Treasurer, and open a new MUR;

6. Sever MoveOn PAC and Wesley Boyd, as Treasurer, and MoveOn.org Voter Fund; and open a new MUR;

- 7.

- 8.

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